

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Ardagh Glass, Inc.
603 E. North Street
Winchester, Indiana 47394

ATTENTION:

Environmental Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Ardagh Glass, Inc. (Ardagh or you) to submit certain information about the facility at 603 E. North Street, Winchester, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule specified in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Ardagh owns and operates an emission source at the Winchester, Indiana facility. We are requesting this information to determine whether your emissions source is complying with the Indiana State Implementation Plan, applicable CAA regulations, and the National Ambient Air Quality Standards.

Ardagh must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Ardagh must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards, and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

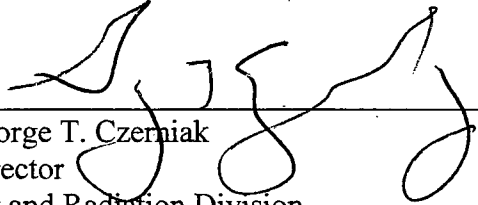
We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Ardagh to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Daniel Schaufelberger at (312) 886-6814.

Date

1/8/14


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document or electronically stored information (ESI) produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents, ESI, or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents, ESI, or information are not available or in your possession and identify any source that either possesses or is likely to possess the documents, ESI, or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents or ESI responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents or ESI in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document or ESI to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive, or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to the response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents or ESI claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

DEFINITIONS

All terms used in this request for information will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.* Reference is made to EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions, when appropriate. Definitional clarification is specified below.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The term "ESI" or "electronically stored information" includes any type of information that is stored in an electronic form and includes, but is not limited to, e-mails, web pages, word processing files, spreadsheets, PowerPoint presentations, audio and video files, databases, and metadata, etc. ESI may be stored in the memory of computers, magnetic disks (such as computer hard drives and floppy disks), optical disks (such as DVDs and CDs), flash memory (such as "thumb" or "flash" drives), and may include ESI located on network drives (including F, G, and H drives), your work desktops, laptops, home computers, and PDAs (e.g., Blackberrys and smart phones), any punch card, disc or disc pack, zip disk, I-pod, digital media player, portable media player, portable hard drive, USB storage device, or other type of portable electronic storage media; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written or electronic material necessary to use such punch card, disc, or disc pack, tape, CD/DVD, zip disk, flash drive, floppy disk, I-

pod, digital media player, portable media player, portable hard drive, USB storage device, or other type of portable electronic storage media, together with printouts of such punch card, disc, or disc pack, tape or other type of memory).

3. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

Appendix B

Ardagh Glass, Inc. (Ardagh) must submit the following information requested for its facility located at 603 E. North Street, Winchester, Indiana (the Facility), pursuant to Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. Section 7414(a), within *forty-five (45) calendar days* from receipt of this request.

1. The date (mm/dd/yyyy) that Furnace #1 and Furnace #2 (the furnaces) began shutdown for the 2015 rebrickings and the day that fuel was no longer fired in the furnaces prior to the rebricking.
2. The date (mm/dd/yyyy) the furnaces began start-up following the 2015 rebrickings.
3. Copies of all engineering and cost analyses, and project justifications, including internal and external correspondence relating to the 2015 rebricking of the furnaces.
4. A list of all capital expenditures greater than \$10,000 related to the 2015 rebrickings. This list should include the approximate date of each expenditure, a brief description of each expenditure, the vendor performing the work, and the value of each expenditure in nominal dollars.
5. As-built drawings of each furnace prior to the rebricking and following the rebricking.
6. Provide the following information for each furnace prior to the rebricking and following the rebricking. Provide an explanation of how each value was calculated:
 - a. Maximum design rated capacity (tons/day) of the furnace alone;
 - b. Actual maximum capacity of the furnace (tons/day), taking into account any physical or operational constraints and restrictions;
 - c. Holding capacity (tons);
 - d. Physical size of the furnace (length and width in feet and depth in inches);
 - e. Melting capacity (tons/hr);
 - f. Maximum pull achieved on the furnace for each campaign, as it is known commonly in the industry, and anticipated maximum pull achieved for the furnaces post rebuild (tons/day);
 - g. Average monthly tons of glass produced during the furnace campaign (tons/day);
 - h. The maximum heat input capacity per hour of the furnace from all heat sources including, but not limited to, fuel firing and electric boost;
 - i. The maximum heat input capacity of the furnace from fuel firing (MMBtu/hr); List the type(s) of fuel used and specify the separate firing capacities for each type of fuel used. Also, identify the fuels the furnace was or is permitted to use and which fuel was or is considered the primary fuel;
 - j. The maximum heat input capacity from electric boost (KVA);
 - k. The ratio of the refiner area to the melting area;
 - l. The ratio of the port area to the melting area;
 - m. The ratio of the checker volume (volume in the regenerators) to the melting area;

- n. The number of burners;
 - o. The burner configuration;
 - p. The make and manufacturer and throughput of each burner; and
 - q. If oxygen is used in any burners, the number of burners, positions of the burners, the amount of oxygen used in each burner, and the purpose of the oxygen use.
7. A description of the product types made in each furnace prior to the rebricking and following the rebricking.
 8. Identify and describe each piece of air emission control equipment and/or each air pollution reduction practice used at each furnace prior to the rebricking and following the rebricking. Provide the date of installation of the control equipment or implementation of the practice, the date of initial operation, and the dates of shutdown or decommissioning, if applicable. Describe in detail how each existing and former air emission control equipment or reduction practice limits air emissions from each source, and how effectively (in terms of removal efficiency, capture efficiency, distribution efficiency, etc.) each air emission is limited by the corresponding equipment or practice. Please provide data to support the answers.
 9. Provide a list of all equipment downstream of the furnaces that has been replaced during the rebricking or following the rebricking.
 10. Provide, for each furnace, the actual annual emissions of nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO), sulfuric acid (H₂SO₄), particulate matter (PM, PM₁₀, and PM_{2.5}) including filterable and condensable particulate (in tons per year) beginning 10 years prior to the date construction commenced on the rebricking listed in response to question #1 to the present as measured by a Continuous Emission Monitoring System (CEMS). Where a CEMS isn't available, provide the best estimate of emissions and include the basis for the estimate and a copy any information relied upon in estimating emissions.
 11. Provide the following *monthly* records (in Microsoft Excel format) for each furnace from 5 years prior to the rebricking dates, listed in response to question #1, to the present:
 - a. Natural Gas Consumption (MMBtu);
 - b. Amount of glass pulled (tons);
 - c. Average percent sulfur in raw materials (wt%);
 - d. Electric boost consumption (kW); and
 - e. Average percent cullet.
 12. Provide a list of any and all air emissions testing that occurred at Furnace #1 and Furnace #2 for NO_x, SO₂, PM (including PM₁₀ and PM_{2.5}), including filterable and condensable PM, H₂SO₄, and CO beginning 10 years prior to the rebricking until the present. Emissions testing includes, but is not limited to compliance testing, engineering testing, and testing for general information. Also provide a copy of any report that resulted from the emission tests which meet the above criteria. Indicate whether such report was shared with the local and/or state permitting agency. A copy of the summary pages from each report is sufficient so long as the summary provides emission rates as well as all the operating parameters recorded during the tests including, but not limited to, the electric boost usage (kW), fuel usage

(MMBtu/hr), glass pull rate (tons/hr), raw materials type and feed rate (lb/hr), percent sulfur in raw material mix, color/type of glass, bridgewall temperature (degrees F), oxygen flow rate (dscf/min), purity of oxygen, air flow rate (dscf/min), air/fuel ratio, and percent cullet usage.

13. For each source test report provided in response to question #12, provide the following daily average data (in Microsoft Excel format) for the tested furnace for each day during the 2 months before and 2 months after the date of the source test: the electric boost usage (kW), fuel usage (MMBtu/hr), glass pull rate (tons/hr), raw materials type and feed rate (lb/hr), percent sulfur in raw material mix, color of glass, bridgewall temperature (degrees F), oxygen flow rate (dscf/min), purity of oxygen, air flow rate (dscf/min), air/fuel ratio, and percent cullet usage.
14. Provide copies of all feasibility or engineering studies conducted beginning 5 years prior to the rebrickings to the present that describes present and future production potential for the facility as a whole and for individual process units or pieces of equipment, including both existing equipment prior to the rebrickings and new equipment added following the rebrickings.
15. Provide copies of all air permit applications, correspondence, and supporting documentation, including all new source review analyses or discussion of new source review submitted to the local and/or state permitting agency relating to the 2015 Furnace #1 and Furnace #2 rebrickings.
16. Did Ardagh calculate Projected Actual Emissions (as defined in 40 CFR § 52.21 (b)(41)) for each furnace before it commenced construction on the rebricking? If so, provide a copy of each projection and any data used to support the projection (such as historical usage or emissions data).

Appendix C

Confidential Business and Personal Privacy Information Assertion Requirements

You may assert a business confidentiality claim covering any part of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emissions data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emissions data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B), and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the CAA, and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and that disclosure of the information is likely to cause substantial harm to your business' competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in the answer to question 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to its detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for this assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. If there any other information you deem relevant to EPA's determination regarding its claim of business confidentiality?

If you receive a request for a substantiation letter from EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate personnel, medical, and similar files from the responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING


I, Kathy Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Environmental Manager
Ardagh Glass, Inc.
603 E. North Street
Winchester, Indiana 47394

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Phil Perry, Chief
Air Compliance and Enforcement Branch
Indiana Department of Environmental
Management
100 N. Senate Ave.
Mail Code 61-53 IGCN 1003
Indianapolis, IN 46204-2251

on the 8 day of January 2016.



Kathy Jones
Program Technician
AECAB, PAS

Certified Mail Receipt Number: 7014 2870 0001 9581 4762